

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicants : Daniel De Sousa et al.
Serial No. : 10/691,795
Filed : October 23, 2003
TC/A.U. : 2157
Confirmation No: 7154
Examiner : El Chanti, Hussein A.

Docket No. : 01-694-2
Customer No. : 34704

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313

REPLY BRIEF

Sir:

This brief is submitted in reply to the Examiner's Answer mailed on August 18, 2009.

In the aforesaid Examiner's Answer, the Examiner points to Sheard et al. and responds to the appeal brief argument that Sheard et al. does not teach the claimed plurality of additional units by referencing applications 2, 3 or 4 of Figure 1 in Sheard as the plurality of additional units. The drawings in Sheard make clear that communication between the various units 1-4 happens through data exchange engine 32. Thus, data from adapter 34A in universal data format is not received by adapter 34B, 34C or 34D. Rather, such data is stored in data exchange engine 32, and sent from there to applications 2, 3 or 4 as needed. This is different from the system of the present claims, there is no direct communication in Sheard between applications 2, 3 or 4 and application 1.

The Examiner on page 9 of the Answer states that the claim language does not call for the additional units to receive the universal data and then transform the data into proper protocol. It is respectfully submitted that the Examiner has misread the claim. The claim calls for "an additional unit spaced from said

installation-local unit and communicated with said installation-local unit for receiving **said** universal data (emphasis added)". In his response to this point, the Examiner has read the word "said" out of the claim. In fact, the additional unit of claim 1 is not just receiving any universal data, but in fact is receiving THE universal data, for which antecedent basis is laid in the claim, which comes from the formatting unit of the installation-local unit.

The Examiner's interpretation of both the claims and the prior art are in error. The interpretation of claim 1 specifically is overbroad with respect at least to the universal data. The interpretation of Sheard is overly specific by reading in more than is actually disclosed at least with respect to the communication between applications 1-4, and the supposed universal data.

It is believed that no fee is due in connection with this reply brief. If any such fee is due, please charge same to Deposit Account Number 02-0184.

Respectfully submitted,

Daniel De Sousa et al.

By /george a. coury/
George A. Coury
Attorney for Applicants
Reg. No. 34,309
Tel: (203) 777-6628
Fax: (203) 865-0297

Date: October 19, 2009